



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
**OREGON OPERATIONS OFFICE**  
811 S.W. 6th Avenue  
Portland, Oregon 97204

January 16, 2007

Mr. Jim McKenna  
Port of Portland & Co-Chairman, Lower Willamette Group  
121 NW Everett  
Portland, Oregon 97209

Mr. Robert Wyatt  
Northwest Natural & Co-Chairman, Lower Willamette Group  
220 Northwest Second Avenue  
Portland, Oregon 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240. Round 3 Sampling for Lamprey (*Lampetra* sp) Ammocoete Tissue

Dear Messrs. Wyatt and McKenna:

The purpose of this letter to provide the Lower Willamette Group (LWG) with direction on analysis of lamprey ammocoete tissue from the lower Willamette River that was collected by the LWG last fall. On November 27, 2006, EPA provided the LWG with a proposal for the analysis of the lamprey ammocoetes. EPA's proposal called for the ammocoetes from the Portland Harbor Study Area to be divided into three samples with limited analysis from the upstream and downstream samples and full analysis from the midstream sample. Similarly, we proposed dividing the macrophthalmia into two samples – upstream and downstream - with limited analysis for each. For the upstream samples, EPA agreed with the original approach developed by the LWG (dated November 14, 2006), but recommended performing chemical analysis for mercury instead of butyltins because mercury is a regional (watershed) contaminant and the lack of butyltin sources (e.g., marinas) upstream of Elk Rock Island.

On December 21, 2006, the LWG submitted two alternative approaches to EPA for consideration. It included an evaluation of the strengths and weaknesses of the original LWG proposal, the EPA counter proposal and the two alternative LWG approaches. Because of the limited number of lamprey ammocoetes collected from the Portland Harbor study area, definitive conclusions regarding the concentration and distribution of chemicals in lamprey tissue are not possible. However EPA does believe that our November 27, 2006 approach provides useful information about the presence of lamprey ammocoetes within the Portland Study area and a preliminary estimate of chemical concentrations in lamprey ammocoete tissue. EPA further believes that while this information alone is not sufficient for making cleanup decisions at the site, it will be useful as one line of evidence in the ecological risk assessment. As a result, EPA

directs the LWG to perform the lamprey ammocoete analysis as described in our November 27, 2006 letter.

Please proceed with the analysis and provide EPA with an estimate of the projected time for completion of the analysis. Please contact Chip Humphrey at (503) 326-2678 or Eric Blischke (503) 326-4006 if you have any questions. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

Chip Humphrey  
Eric Blischke  
Remedial Project Managers

cc: Greg Ulirsch, ATSDR  
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